

Module 9: Communication

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GUIDANCE

An EMS should provide a means for internal and external communication. Internal communication should identify, explain, and communicate environmental requirements and voluntary undertakings to all employees, on-site service providers, and contractors whose work could affect your ability to meet those requirements and undertakings. Environmental requirements include statutes, regulations, permits, and enforceable agreements. Voluntary undertakings include any environmental principles or industry norms that an organization may choose to adopt. Examples of voluntary undertakings include voluntary codes of practice for safety, risk management, and energy efficiency issues, or sectoral and international environmental principles such as the Coalition for Environmentally Responsible Economies (CERES) principles or the International Chamber of Commerce Business Charter for Sustainable Development, among others. External communication can provide other stakeholders with information on your environmental programs and accomplishments and provide a means for external parties to comment or provide input to you.

Working with Stakeholders

Stakeholders include anyone who has a stake in your company's environmental performance. Internal and external stakeholders can play an important role in helping your company develop an EMS. Employees have a strong stakeholder interest in your company and can provide strong support for EMS development. Customers, suppliers, and neighbors also can provide useful inputs. In addition, establishing partnerships with trade associations, suppliers, professional associations, and universities can be very helpful in developing parts of your EMS. This module will help you identify the kinds of stakeholders you may wish to include in the process, the potential benefits of including stakeholders, and tips for better communication with stakeholders. **While involvement of employees is critical to the success of your EMS, how far you proceed with including additional stakeholders is your decision.**

Identifying and Understanding Stakeholders

Almost every organization will have a wide array of internal and external groups that may be interested in, and helpful partners to, that organization. These groups will not be homogenous. Each will have its own priorities and perspectives and each will have something different to contribute in support of your EMS. Part of communication is identifying and understanding these parties over time. Two types of stakeholders are discussed in this module: internal and external.

Examples of internal and external stakeholders are provided below:

Internal Stakeholders

- Employees
- Shareholders
- Customers
- Suppliers
- Investors & Insurers
- Trading Partners

External Stakeholders

- Neighbors
- Community Organizations
- Environmental Groups
- Larger Companies
- The Media
- The General Public

You may want to start by communicating with those stakeholders who have expressed interest in your operations. If you desire additional input, you might take the following steps in your effort to locate suitable stakeholders:

- ask your employees, including plant/site managers and public relations personnel;
- obtain suggestions from local officials;
- contact a local planning agency for suggestions; or
- get input from a national advocacy group regarding local or national groups that may be interested/suitable.

Stakeholder Roles

Before engaging stakeholders, be clear on what you expect their role to be. Consider why you want to include internal and external stakeholders and what roles they can play. What do you want from them? What do you intend to tell them? Consider the following:

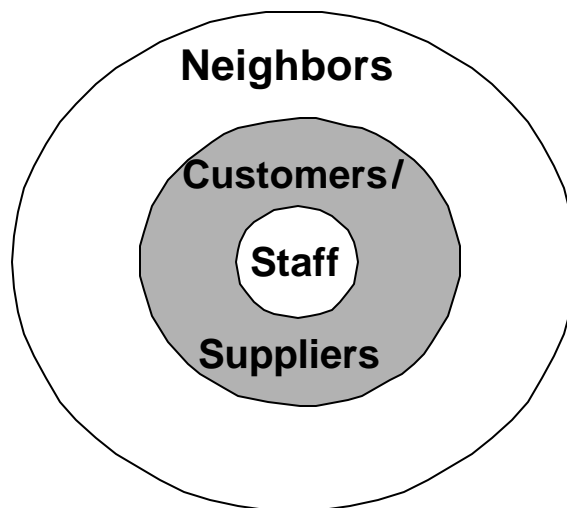
- Internal stakeholder (e.g., employee) participation can facilitate implementation of environmental projects as employees “take ownership” of the EMS and the changes it may bring.
- Different stakeholders bring useful perspectives to environmental issues, often identifying issues that might otherwise have been overlooked.
- Participation by all types of stakeholders can add credibility, transparency and value to your EMS.
- Involving external stakeholders can help them understand your business’ operating constraints.
- Sometimes being an environmental leader can confer customer recognition and loyalty, and involving customers in your EMS helps them recognize your leadership.
- Forming partnerships with customers and suppliers can help to identify shared concerns and ways to cooperate to resolve them. There may be ways that your company can help your customers meet their environmental management needs. Forming partnerships with suppliers can help your company obtain important information and may help you meet your EMS goals.

How to Work with Your Stakeholders

The next stage of the process is to communicate with stakeholders. This provides an opportunity to further refine your understanding of their interests.

Develop stakeholder participation in stages and learn as you go. You might think about the different kinds of stakeholders as forming ever-broader circles around your business (see **Figure 9-1**). Begin with the innermost circle and work outward.

Figure 9-1: Levels of Stakeholder Interest



L Tip

Create and maintain a list of everyone you can think of who would be interested in your facility's environmental activities. Include how you could reach them (for example, if you already have established ways of communicating with certain groups, you might start with those). You can then make a decision about where to begin. You could start with staff and later add other stakeholders if that suits your capabilities and needs. It is helpful to make your communication list as complete as possible, and then pare it down to a manageable list as you start out. Begin small, and then you can use the list to expand when ready.

L Tip

Remember, your stakeholders' concerns may be very different from what you expect, and may be less difficult to resolve than you may think. The only way to find out is to talk with them.

Hints for Effective Communication

When working with either internal or external stakeholders, including your Cross Functional Team (CFT), effective communication will facilitate smooth implementation of your EMS. You will want to follow these effective rules of communication:

- 1. Begin early in the process.** Let people know what you are doing. In most cases, you will need the cooperation of several people within your company to gather information and develop an EMS that works. In small and large organizations, early communication will pay off in greater acceptance of the resulting system.
- 2. Set communication objectives.** Decide what you want to achieve. Setting goals will help you get the right message across without overwhelming people with too much information, spending too much time, or missing the mark. It is helpful to create an EMS communication procedure for your company. The procedure should outline what kinds of information will be communicated to external stakeholders, and how the company will document and respond to communications from external stakeholders. It should include communication for emergency and preparedness and response stakeholders. It can also address internal stakeholder communication principles.
- 3. Communicate regularly and integrate EMS communication with other efforts.** To build support for the EMS, communicate on a regular basis. Some simple means of regular communication can usually be accomplished without straining resources – for example, a bulletin board posting, email messages, or articles in the organization newsletter. Don't forget to consider direct word-of-mouth communication, particularly in smaller organizations. Talking directly with key individuals at regular intervals may be the best mechanism for ensuring good communication. Use existing channels of communication to communicate your EMS activities.

Consider various methods of regular communication with stakeholders about your company and your environmental efforts and goals. These methods can build on existing methods, such as:

- discussing the EMS at company meetings;
- updating the company website or including as part of your annual report;
- scheduling tours of your facility;
- producing a fact sheet about your facility's activities, the EMS program, and why and how your company would like to include stakeholders;
- establishing a phone line to answer questions, record concerns, etc.;
- holding public meetings when you feel it is appropriate.

L Tip

Make use of current technology. A company website can be used to communicate your company's environmental policy and other important elements of your EMS. It can also be used to solicit comments and suggestions from stakeholders.

4. Ensure that stakeholder dialogue is a two-way process. The stakeholders will want to know that their comments and concerns are being listened to and taken into account. You need to convey that your organization is genuinely interested in their input and explain how you will include them.

5. Track communication. You should develop a procedure for documenting and responding to stakeholder communication. This will help you track input from stakeholders and documentation of your responses or efforts. Also, a person should be appointed to be responsible for carrying out your communication procedure. **Tool 9-2** provides a sample procedure for communication with stakeholders.



TOOLS

Tool 9-1a: Communications Worksheet

Who are our key external stakeholders ?	
How were these stakeholders identified ?	
With regard to our organization, what are the key concerns of these stakeholders ?	
How do we know this?	
What community outreach efforts are we making now (or have we made in the recent past)?	
How successful have these efforts been?	
What methods do we use for external communications? Which appear to be the most effective ?	
Who has primary responsibility for external communications?	
How do we gather and analyze information to be communicated?	
Who has responsibility for this?	
How do we communicate internally (as well as with our suppliers and contractors)? What processes do we have to respond to internal inquiries , concerns and suggestions?	
How effective are these methods?	
<i>Our next step on communication is to ...</i>	

Tool 9-1b: Sample Communications Program Matrix

Stakeholder(s)	Potential Environmental Interest	What We Want to Tell Them	What We Want Them to Tell Us	How We Will Communicate With/ Tell Them	When We Will Do It	Person Responsible

See **Example 9-2a** for an example of how to fill out this matrix (note: not all columns are repeated on Example 9-2a).

Tool 9-2: Sample Procedure for Communication with Stakeholders

Purpose

To ensure that stakeholders receive appropriate information about, and can provide input regarding, environmental activities, [Your Facility's Name] has developed this company policy for considering and, where appropriate, responding to queries, comments, or complaints from stakeholders. Both internal and external stakeholders are addressed.

Procedure

1. The cross functional team (CFT) will identify stakeholders and their potential interests in the environmental performance of [Your Facility's Name] using **Form 9-2a**. The CFT also determines what communication on SEAs will occur and records its decision on **Form 9-2a**. If the CFT decides that proactive communication on environmental issues is necessary with any group, that decision is recorded on **Form 9-2a** and responsibility is designated. Internal stakeholder communication is addressed through a variety of elements of our EMS such as training, objectives and targets, and implementation that all require internal stakeholder communication.
2. Internal communication is documented as appropriate for EMS needs. When any form of communication is received from external stakeholders regarding our environmental performance or management, that communication is immediately forwarded to the Environmental Management Representative (EMR). The EMR also maintains communication with response agencies as outlined in Module 13.
3. The EMR considers the nature of any external stakeholder communication and makes a decision on whether and how to respond, based on the guidance in **Form 9-2a**. The EMR is responsible for maintaining records of each external stakeholder communication and response using **Form 9-2b**, Stakeholder Communication Record. Where internal actions are necessary to address nonconformance with this procedure, this is noted on **Form 9-2b** and a Corrective and Preventive Action Notice (CAPAN) is initiated using Form 15-2a.

Guidance for Communicating with Stakeholders on Environmental Issues: This facility's environmental policy will be made available to all stakeholders upon request. Our facility also will do its best, to respond in kind to all good-faith communications from stakeholders about environmental issues. However, our facility (under guidance of EMR) may choose not to respond in all cases, particularly if a request is made in bad faith or if sensitive data is requested.

Frequency

On an as-needed basis for external input, and as shown on Form 9-2a.

Records

Records of environmental communications from external stakeholders and our corporation's responses are kept by the EMR and are tracked using **Form 9-2b**. An updated version of **Form 9-2a**, Stakeholders and Environmental Issues, is kept in the EMS manual.

Form 9-2a: Sample Form for Stakeholders and Environmental Issues

Stakeholder(s)	Potential Environmental Interest	Communication Plan And Basis* (with frequency, as applicable)	Person Responsible

* The communication plan may include a decision not to do outreach at this time. This form should document that communication to external stakeholders regarding significant environmental aspects was considered (whether or not outreach is undertaken at this time).

Contact Person:

Date Completed:

Form 9-2b: Sample Form for External Stakeholder Communication Record

External Stakeholder Communication Record	
Date Communication Received	
Type of Communication	
Received From	
Address/Telephone Number/ E-Mail	
Content of Communication.	Copy attached? YES NO (attach copy if possible).
Will We Respond?	YES NO
Date of Response	
Person Responding	
Position	
Nature of Response.	Copy attached? YES NO (attach copy if possible).
Are Internal Actions Necessary?	YES NO
(If Yes, fill out a Corrective and Preventive Action Notice (see Module 15))	

Contact Person:

Date Completed:



EXAMPLES

Example 9-1: Case Study—Working with Stakeholders

The following Case Study shows how “Company B” set up a process to train and use employees (internal stakeholders) to identify environmental concerns and some of the benefits achieved.

Case Study: Company B--Working With Stakeholders

Company B is a 50-person company that does parts coating for the automotive industry. With senior management backing and support from a local consultant, Company B focused initially on building environmental awareness among its employees. Company B offered general environmental awareness training to all workers and managers and additional training on how to identify specific environmental issues. Employees then were divided into 10 teams, each charged with identifying the environmental issues associated with a specific area of operation, from the acquisition of raw materials through to delivery of the product. Using this input, Company B developed a list of its most important environmental issues and concrete objectives and plans for improvement.

The key to Company B’s success lay in using participatory teams to identify new environmental issues and develop solutions. For example, the company identified environmental impacts of solvent-based cleaning of parts, and teams from more than one area found ways of reducing these impacts. Company B now has a process by which it stores parts to prevent scaling, rust or material contamination that required solvent-based pre-cleaning of parts in the past. It also enhanced its training of new employees and contractors that do solvent-based cleaning regarding when water-based parts washers could be used and how to maximize the efficiency and reduce waste associated with solvent-based cleaning.

Other benefits Company B has realized include improved compliance, a safer work environment, and reduced emissions from its transport vehicles thanks to improved maintenance. The environmental awareness of all employees has increased significantly, with some workers extending their new-found environmental awareness to their homes. The company has also publicized its implementation of an EMS to the local community in an effort to improve its community relations and to help improve the environmental awareness of the community.

Example 9-2: Communications Program Matrix

Stakeholder(s)	Potential or Known Environmental Interest	What We Want to Tell Them:	What We Want Them to Tell Us:	How we Will Communicate with/Tell Them:	When We Will Tell Them	Person Responsible
Employees	<ul style="list-style-type: none"> ➤ Safety for workers ➤ Protection of environment ➤ Competitiveness 	Environmental policy	How to get it done	Memo, bulletin board, meetings, suggestion box, intranet	Initial training for new employees, EMS update at annual picnic, as needed per training program for specific workers	EMR, CFT, and training personnel
Neighbors	<ul style="list-style-type: none"> ➤ Our expansion on north side of ship yard, near residences ➤ Run off into creek behind electrical shop 	Environmental policy and EMS plans	Their environmental concerns, particularly regarding planned expansion	Meetings, open house, flyers, suggestion box, web site	Town meeting in November (for expansion discussion) Annual open house Web site (ongoing)	EMR with communications representative (as appropriate)
Customers	<ul style="list-style-type: none"> ➤ Major client considering requiring EMS for suppliers 	Environmental policy and EMS plans	Specific EMS requirements that might ensue	Above, plus inserts in direct mail advertising, or invoices and on our web site	Ongoing and as billing occurs	Marketing lead and company president
Contact Person:			Date Completed:			

Example 9-2 above provides an example of how to complete Tool 9-1b.